

IN THE CIRCUIT COURT OF CRITTENDEN COUNTY, ARKANSAS
CIVIL DIVISION

FILED

2014 OCT 28 PM 3: 38

LASHEIKA JACKSON

PLAINTIFFS
TERRY HAWKINS
CIRCUIT COURT CLERK
CRITTENDEN COUNTY, AR

NO *CV* 2014-377

EDWARD BURLESON
MARTEN TRANSPORT

DEFENDANTS

COMPLAINT

COMES the Plaintiff, by and through his attorney, Roy C. Lewellen and for her Complaint would state:

1. That this Court has jurisdiction over the parties and subject matter and venue is proper in this Court pursuant to Arkansas Law.
2. That the Plaintiff is a resident of West Memphis, Arkansas and the Defendant, Edward Burleson is a resident of Mount Pleasant, Texas and operator of the vehicle referred herein, and Defendant Marten Transport is the owner of the vehicle and a business authorized to transport, corporate office located in Mondovi, Wisconsin.
3. That on or around November 20, 2011, Plaintiff was traveling in the right lane when Defendant was in left lane attempting to cross to right lane. The Defendant hit the left side of Plaintiff's vehicle.



4. That the Defendant failed to yield or take the proper precautions which caused the Defendant strike Plaintiff's vehicle.
5. That as a result of said accident, Plaintiff was severely injured.
6. That the Defendant Marten Transport knew or should have known that Edward Burleson was an unsafe driver and was negligent by entrusting said Defendant with the operation of the vehicle.
7. That the Defendant was negligent, careless, and reckless at the time and place above mentioned in one of more particulars.
 - a. In failing to maintain a proper and well-kept environment.
 - b. In failing to keep vehicle under proper control;
 - c. In failing to use the degree of care and caution that a reasonable prudent person would have used under the circumstances.
8. That the Plaintiff was free of negligent on his part.
9. That the Plaintiff's vehicle was damaged substantially and the value of said vehicle diminished.
10. That the Plaintiff has suffered pain and suffering and medical expenses.
11. That the Plaintiff has suffered physical injuries, medical expenses, and loss wages.

12. That the Plaintiff is entitled to judgment against the Defendant for compensatory and actual damages. That the Plaintiff requests a trial by jury.

13. That the Plaintiff should be awarded statutory penalty as permitted by law.

WHEREFORE, premise considered, the Plaintiff prays that she be awarded judgment against the Defendants for her pain and suffering, medical expenses, future medical cost, and attorney's fees, and for all other relief to which she is entitled.

Respectfully submitted,



Roy C. Lewellen 82093
LEWELLEN AND ASSOCIATES
17 North Poplar
Marianna AR 72360
870-295-2764